

JOHN "JACK" JONES, 5-19-09

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IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,))
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)
)
Plaintiff,)
)
vs.) 4:05-CV-00329-TCK-SAJ
)
TYSON FOODS, INC., et al,)
)
Defendants.)

- - - - -
THE VIDEOTAPED DEPOSITION OF
JOHN "JACK" JONES, produced as a witness on
behalf of the Defendants in the above styled and
numbered cause, taken on the 19th day of May, 2009,
in the City of Tulsa, County of Tulsa, State of
Oklahoma, before me, Lisa A. Steinmeyer, a Certified
Shorthand Reporter, duly certified under and by
virtue of the laws of the State of Oklahoma.

TULSA FREELANCE REPORTERS
918-587-2878

Exhibit HH

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1 Q Have you ever toured the Illinois River
2 watershed?

3 A Yes.

4 Q When?

5 A May 7th and 8th of this year. 10:13AM

6 Q This year. Where did you go?

7 A I drove east on -- is it Highway 412?

8 Q Uh-huh.

9 A And then drove south on Arkansas 59 and drove
10 down to Tenkiller. As I approached the northern end 10:14AM
11 of the lake, I turned north on Highway 10 and drove
12 up Highway 10 a ways. I stopped at the -- is it the
13 Oklahoma Scenic River Commission office there on
14 Highway 10, and I spoke with a ranger for a while.

15 Then I drove through the town of Tahlequah, 10:14AM
16 through the older downtown area and then through the
17 kind of big box southern area of town, and then I
18 went along the east side of Tenkiller Reservoir. I
19 stopped. Last week was high flow. In fact, the
20 ranger said that the Illinois River was at about 10:15AM

21 twelve and a half feet, and normally it runs at
22 about three feet. So I stopped at the Elk Creek
23 Corps of Engineers park there in the riverine zone
24 of the reservoir, observed that it was turbid,
25 observed that the reservoir was high, observed that 10:15AM

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1 the boat ramps were inundated, the shoreline was
2 inundated.

3 Q Did anybody go with you?

4 A No.

5 Q Have you been to the Broken Bow Reservoir? 10:15AM

6 A Did you want to hear what else I --

7 MR. BASSETT: No.

8 Q That's okay. Have you ever been to Broken
9 Bow?

10 A Yes. 10:16AM

11 Q When did you go to Broken Bow?

12 A The next day.

13 Q Did you do a similar car tour by yourself of
14 the watershed and the reservoir?

15 A I did, and I stopped at the dam and observed 10:16AM
16 the lake, and I collected a sample.

17 Q Did anyone instruct you to collect that
18 sample?

19 A No.

20 Q Okay. I'm going to hand you a copy of the 10:16AM
21 report of Drs. Cooke and Welch, and we'll put a
22 sticker on that. Can you tell me who all
23 participated in the preparation of this report;
24 which individuals?

25 A Dr. Cooke and Dr. Welch, and early on I gave 10:17AM

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